

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.)
W.A. DREW EDMONDSON, in his)
Capacity as ATTORNEY GENERAL OF)
THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C MILES TOLBERT,)
in his capacity as the TRUSTEE FOR)
NATURAL RESOURCES FOR THE)
STATE OF OKLAHOMA,)

Plaintiffs)

v.)

Case No. 4:05-cv-00329-JOE-SAJ

TYSON FOODS, INC.,)
TYSON POULTRY, INC.,)
TYSON CHICKEN, INC.,)
COBB-VANTRESS, INC.,)
AVIAGEN, INC.,)
CAL-MAINE FOODS, INC.,)
CAL-MAINE FARMS, INC.,)
CARGILL, INC.,)
CARGILL TURKEY PRODUCTION, LLC,)
GEORGE'S, INC.,)
GEORGE'S FARMS, INC.,)
PETERSON FARMS, INC.,)
SIMMONS FOODS, INC.,)
WILLOW BROOK FOODS, INC.,)

Defendants)

JOINDER BY SEPARATE DEFENDANT SIMMONS FOODS, INC. IN
DEFENDANTS REPLIES TO PLAINTIFFS' RESPONSES TO SPECIFIC
MOTIONS

Defendant Simmons Foods, Inc. joins in the following reply briefs filed by other
Defendants and incorporates by reference all statements, arguments and points of
authority and requests for relief contained therein:

1. Cobb-Vantress, Inc.'s Reply in Support of Motion to Dismiss Counts Four, Six, Seven, Eight, Nine and Ten of the First Amended Complaint or, Alternatively, To Stay the Action. [Doc. No. 142];

2. Reply to Plaintiffs' Response to Tyson Foods, Inc., Tyson Poultry, Inc., Tyson Chicken, Inc., and Cobb-Vantress, Inc.'s Motion for More Definite Statement with Respect to Counts One and Two of the Amended Complaint by [Doc. No. 143];

3. Reply Memorandum of Tyson Foods, Inc. In Support of Its Motion to Dismiss Counts 4-10 of the First Amended Complaint. [Doc. No. 144];

4. Tyson Poultry, Inc.'s Reply In Support of its Motion to Dismiss Count 3 of Plaintiffs' First Amended Complaint. [Doc. No. 145];

5. Tyson Chicken, Inc.'s Reply on its Motion to Dismiss Counts 4, 5, 6 and 10 of the First Amended Complaint Under the Political Question Doctrine. [Doc. No. 146];

6. Peterson Farms, Inc.'s Reply to Plaintiffs' Response in Opposition to Peterson Farms, Inc.'s Alternative Motion to Stay Proceedings Pending Appropriate Regulatory Agency Action, and Brief in Support. [Doc. No. 147];

7. Peterson Farms, Inc.'s Reply to Plaintiffs' Response in Opposition to Peterson Farms, Inc.'s Motion to Dismiss and Brief in Support. [Doc. No. 149].

DATED this 7th day of December, 2005.

s/Vicki Bronson

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CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2005, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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